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## facsimile transmittal

To: Patrick Bird Fax: 617 918 0287  
From: Stephen Armstrong Date: 08-10-12  
Re: Regulatory Applicability Request Pages: 8  
Cc:

☐ Urgent ☐ For review ☐ Please comment ☐ Please reply ☐ Please recycle

**Notes:**



August 9, 2012

Dave Conroy  
Air Programs Branch Chief  
US EPA New England  
5 Post Office Square  
Mail Code: OEP05-2  
Boston, MA, 02109-3912

Mr. Conroy,

IST Energy formally requests determination as to regulatory applicability in order to operate the GEM Waste-To-Energy system at the Plymouth County Correctional Facility at 24 Long Pond Rd. in Plymouth Massachusetts. The system has been designed and built to convert waste into usable energy for the facility via a gasification reactor. Operational descriptions of both the GEM Waste-To-Energy system and the facility are included to aid in the determination.

Regards,

A handwritten signature in black ink, appearing to read "Stephen Armstrong". The signature is fluid and cursive, with the first name "Stephen" and last name "Armstrong" clearly distinguishable.

Stephen Armstrong

Co. Ian Cohen, Patrick Bird



## **Summary**

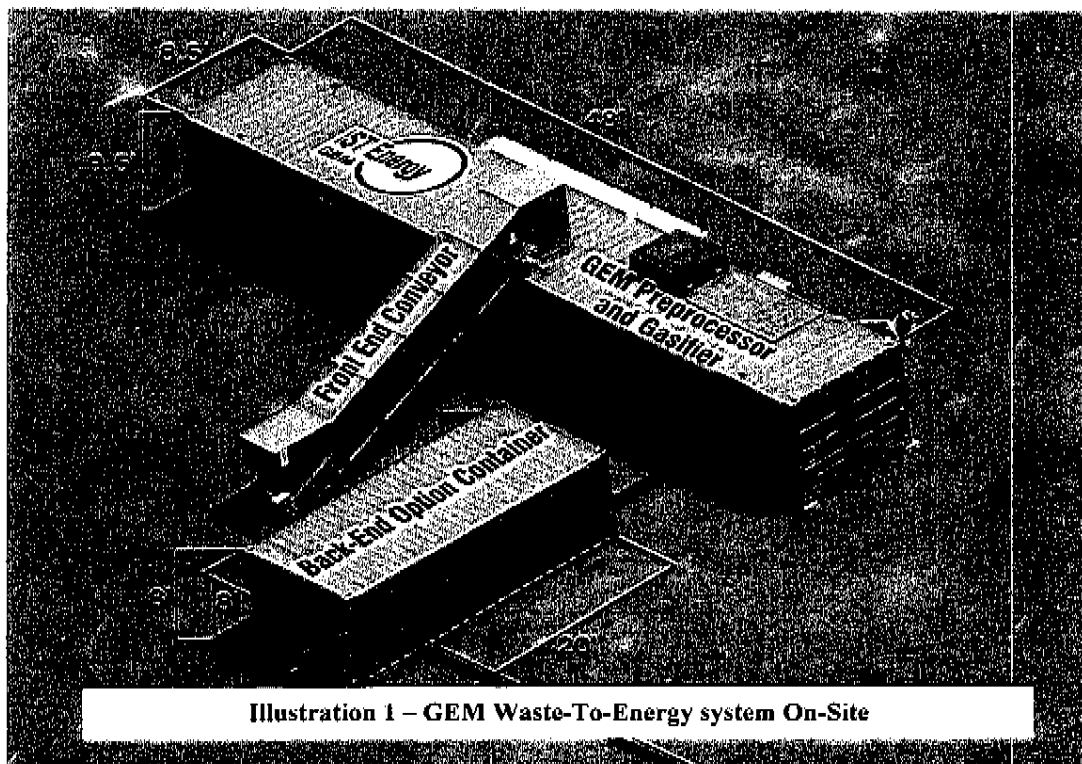
The GEM Waste-to-Energy system provides a proprietary solution for the thermal conversion of non-recyclable paper, cardboard, wood, plastic, food, and non-compostable agricultural waste into heat to be used by the host facility, thereby reducing the costs associated with energy and land filling. This system utilizes gasification (not incineration) technology to convert waste into distributed and clean energy. The system readily integrates into processing streams for institutions, businesses, and the military and provides a highly efficient and regulatory friendly means to derive more value from refuse.

The GEM Waste-To-Energy system is an integrated, standalone system consisting of three major components. These modular components are 1.) The Solid Waste Pre-Processor Module, 2.) The Gasifier Module and 3.) The Back End Option Module (Boiler). When integrated, the GEM Waste-To-Energy system provides a turnkey, alternative energy source that requires no segregation of food waste and has the ability to handle up to 3 tons per day.

The physical footprint of the GEM Waste-To-Energy system makes it portable via industry standard trucking methods. The Gasifier and Solid Waste Pre-Processor reside within a single 8ft x 9.5ft x 48ft shipping container. The Back End Option Module (boiler) is located in a separate 8ft x 8ft x 20ft container to convert the potential chemical energy of the syngas into heat to be used by the facility.

For operation at the Plymouth County Correctional Facility the GEM will operate approximately 8 hours each day to process the waste generated by the facility into energy. The facility generates about 1 ton of material each day which is currently compacted and hauled. Recyclable materials such as paper, cardboard, plastic, metals and glass are separated from the waste in the facility and will continue to be recycled during GEM operation.

Illustration 1 provides a picture of the GEM Waste-To-Energy system as described above.



### **Equipment Operation**

For the duration of the pilot operation of the system at the Plymouth County Correctional Facility, IST Energy will own and operate the equipment. During this pilot operation, waste normally directed to the existing compactors for waste hauler removal will be brought to the waste-to-energy system. IST Energy personnel will oversee the operation of the equipment. All maintenance procedures and waste handling into the waste-to-energy system will be conducted by IST Energy staff.

The Plymouth County Correctional Facility generates about 1 ton of waste material hauled for disposal each day. This waste is primarily cafeteria waste and includes plastic packaging for inmates who are delivered meals to satellite locations. Other waste from the facility includes office waste from correctional staff and inmate generated waste from the cells.

The existing recycling program at the Plymouth County Correctional Facility will continue to divert recyclables. The system in place is inspected by Mass DEP and the Department of Corrections for compliance with the waste ban.



During this pilot it is anticipated that the waste-to-energy system will operate for eight hours each day to convert the waste generated by the facility into energy. The system will be started Monday through Friday in the morning (at approximately 8am) and operate until the days waste is converted (typically within 8 hours). Waste will be delivered after each meal of the day. The IST Energy staff will operate the waste-to-energy system 5 days of each week.

The ash produced by the gasifier will be periodically TCLP tested to verify that it can be disposed in a MSW landfill. It is not anticipated that any toxic leachates will be found in the feedstock material or the ash because of the controlled environment the waste is being generated from.

The system is controlled by a PLC based control system. Feedstock is added by the operator when feedstock level indicators show that the system is ready for additional material. Extensive operating variables are measured throughout the entire process. The control system is designed to optimize material processing while minimizing power usage within the system.

### **Waste Pre-Processor**

The waste pre-processor begins by shredding the feedstock. A four shaft rotary shredder is used to reduce the feedstock material (waste) piece size to a maximum of 20mm. The amount of material in the shredder is electronically controlled so if there is no material to shred, it is shut off. This electronically controlled shutdown logic is applied to all processing steps within the waste-to-energy system. If there is no material to process, that portion of the system is automatically shut down to reduce energy consumption and overall system parasitic loss. From the shredder, material is conveyed to the dryer. The material passes by a continuous moisture sensor before going into the drying unit. The moisture content will dictate how much hot air should be supplied to the dryer. The heat is developed from a heat recovery process (heat exchanger cooling the produced syngas) in the gasifier system and is ducted to the dryer. The moisture level of the outlet of the dryer is measured to ensure proper drying occurred. If the product leaving the dryer is out of spec the control system will adjust the retention time of the material in the dryer to correct. Undesirables are then separated using a density separator and then the remaining material is compressed into fuel pellets 12mm in diameter and 20-40mm in length.

The amount of material which is turned into pellets is electronically weighed so throughput of the pre-processor and gasifier can be quantified.

The amount of current on all motors is monitored to determine loading condition of each processing step. If any motor begins to cross its normal operating threshold an alarm condition is signaled and the system will continue to monitor the motor until the system either comes back down to normal operating amperage or increases to a fault condition. If a system faults, the faulted operation and all prior operations are automatically suspended until the fault is corrected.



The waste pre-processor is capable of processing 3 tons of material in 12-14 hours. This will maintain a duty cycle of the system within 50%-60%. One ton of feedstock material supplied from the Plymouth County Correctional Facility will be processed into fuel pellets within 4-5 hours of operation. This one ton of feedstock will result in approximately 1600lb of pellets for the gasifier to convert into syngas because of the moisture removed in the Pre-Process dryer.

## **Gasifier**

A downdraft gasification system is used to convert the solid fuel pellet into a synthetic gas product. It is important to maintain an optimal temperature profile within the gasifier to produce the highest carbon conversion rate and lowest tar output product. There are temperature probes in each of the nine zones of the gasifier to ensure a consistent temperature profile.

Temperatures are electronically maintained at the proper levels within the gasifier by adjusting the amount of ambient air being drawn into the gasifier at different vertical heights. Seven of the nine zones have controlled secondary air introduced into the gasifier to control the different chemical reactions within the gasifier. These zones control the four major reaction schemes in the process. The first is a drying stage where the pellets are in a zone above 100°C and moisture is removed. The material then enters a pyrolysis stage where the volatile matter is removed from the pellet in the form of gas. The other product of this process is char. The pyrolysis stage operates between 400 and 800°C. The next part of the reactor combusts the gasses developed in the pyrolysis stage and performs char reduction. This process develops CO<sub>2</sub> and H<sub>2</sub>O as well as reduces the remaining char material. This stage operates at temperatures between 1000 and 1200°C. The final stage of the reactor performs a reduction reaction where CO<sub>2</sub> and H<sub>2</sub>O are converted into H<sub>2</sub> and CO. This is done when the gas enters a region of the reactor where oxygen is absent and the high temperature and char allow for the reduction reaction to occur.

The product that leaves the reactor consists of CO, H<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>, CO<sub>2</sub> and H<sub>2</sub>O. The pressure differential across the base of the gasifier is also electronically monitored and the vacuum adjusted to maintain the proper gas pressure and velocity within the entire system. Since the entire gasifier system is operated under negative pressure, there are no emissions released during the process. The synthetic gas (syngas) goes through several conditioning steps to provide a suitable product for downstream use. The conditioning consists of particulate filtering and syngas cooling.

## **Boiler**

The syngas generated by the gasifier is piped from the gasifier through steel piping to a boiler located in another container. The syngas is fired in a Weil McLain Series 88 boiler using an Eclipse ThermAir Model TA200 burner. This combination allows efficient energy harvest of the syngas. A propylene glycol/water heat transfer liquid loop is used to pre-heat the hot water circulation system within the jail. This reduces the overall heating load for the water heaters located in the jail and reduces natural gas usage for the facility.



With the efficiency of the boiler/burner combination and the heat transfer loop it is expected that the boiler running on syngas will be able to supply the Plymouth County Correctional Facility with 1.0 MMBtu/hr (or 10 Therms/hr) of heat in the existing hot water system during the pilot program.

### **Waste Material Sources**

The waste material for this system will originate from jail and support buildings.

Waste materials will be collected from the cafeteria as well as the waste from the seven individual pods of the jail. This material is currently directed to the compactors as waste and hauled by the contracted waste hauler.

Waste material from the offices at the Administration Building will also be directed to the GEM Waste-To-Energy system.

The existing recycling program will continue to divert materials listed on the Mass DEP waste ban for recycling.

The facility generates approximately 1 ton of waste each day. Samples analyzed have shown the average moisture content of the material to be 35%. The material will be dried to a moisture content of 10%-15% internally in the waste Pre-Processor before being densified into pellets. The GEM Waste-To-Energy gasifier is capable of gasifying 200lb of material in one hour. At this rate, the one ton of material dried should yield 1600 lb of pellets which will be converted to syngas in the gasifier in 8 hours of gasifier operation.

### **Waste Material Content**

IST Energy expects the contents of the waste stream to include food scraps, non-recyclable paper/cardboard and certain plastics. Due to the nature of the facility the waste generated is predictable and controlled by the operators of the facility (Sherriff's Department).

The plastics are limited to non-recyclable polyethylene terephthalates, high density polyethylene, low density polyethylene, polypropylene and polystyrene packaging.

Energy will not be accepting any industrial, construction and demolition and/or any hazardous waste (including biohazards).

Any material collected during a 24 hour period which cannot be processed by the GEM Waste-To-Energy system will be disposed in the existing compactors.

Table 1 below identifies what Energy predicts the composition of the waste stream will be.

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**Table 1 - Expected Waste Composition for the GEM**

| <b>Waste Component</b> | <b>Weight %</b> | <b>Heating Value<br/>(BTU/lb)</b> |
|------------------------|-----------------|-----------------------------------|
| Food                   | 25              | 2,500                             |
| Paper/cardboard        | 35              | 8,000                             |
| Plastics               | 35              | 18,000                            |

### **Unacceptable Materials**

IST Energy has defined the materials unacceptable for the GEM Waste-To-Energy system as any construction and demolition waste, PVC pipe, Plastics # 7 (labeled as other plastics) and hazardous wastes.

To ensure Energy is putting forth its best effort to ensure these components are not present in the waste stream, there will be a quality check of every bag performed to ensure these materials are not present. This process will be modified as required to ensure unacceptable materials are not included in the waste stream. The waste from the facility is collected in clear plastic bags for security reasons and allows Energy to verify contents before they are placed in the GEM Waste-To-Energy system

### **General Recycling**

It's the goal of IST Energy to convert post consumable materials that are not suitable for recycling into heat for the facility. As part of IST Energy's ongoing goal to provide clean, safe energy for the future, it recognizes the important role recycling programs have in sustaining the environment.

It is not IST Energy's intention to replace any customer's current recycling program.